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April 23, 2009

**VIA FACSIMILE (609-989-0463)**

The Honorable Garrett E. Brown, Jr., Chief U.S.D.J.  
United States District Court  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, New Jersey 08608

**RECEIVED**

**APR 24 2009**

AT 8:30  
WILLIAM T. WALSH  
CLERK

**Re: In re Synchronoss Securities Litigation  
Civil Action No.: 08-4437 (GEB)(TJB)**

Dear Chief Judge Brown:

This firm represents Defendants Synchronoss Technologies, Inc., Stephen G. Waldis, and Lawrence R. Irving in the above referenced matter. We write on behalf of Defendants to request a page extension for Defendants' joint brief in support of their impending motion to dismiss the Amended Consolidated Class Action Complaint ("Consolidated Complaint"), due to be filed on Friday, April 24, 2009, pursuant to Your Honor's Scheduling Order (Docket Entry No. 19).

Defendants herein seek leave to file a single, comprehensive brief of no more than 50 pages (Times New Roman 12 font) that responds on behalf of all Defendants. For the Court's convenience, all of the Defendants in this case have consolidated their arguments into one memorandum, even though each Defendant is permitted to submit a separate memorandum of up to thirty pages. Defendants believe a single, joint brief is more efficient, will lessen the burden on the Court, will reduce the total number of briefs, and will eliminate unnecessary duplication.

Further, the dismissal of the Consolidated Complaint raises a number of complex legal issues that Defendants will address in their brief. Consequently, notwithstanding Defendants' efforts to streamline their brief, Defendants require additional pages to address these issues. In addition, Defendants' motion to dismiss, if granted, will be dispositive as to all of Plaintiffs' claims.

For these reasons, Defendants respectfully request leave to file a brief of no more than 50 pages. Plaintiffs have granted their consent to this request up to 45 pages and no more, and have requested that, should the Court grant Defendants a page-limit extension, Plaintiffs be granted the same extension for their opposition brief. If Defendants' proposal is acceptable to the Court, we respectfully request that the Court "So Order" this request, otherwise we can provide an appropriate Order or confirming letter as the Court prefers.

GIBBONS P.C.

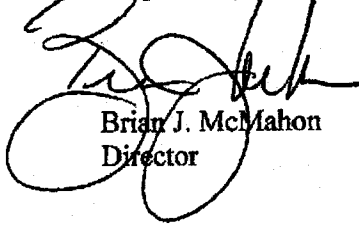
The Honorable Garrett E. Brown, Jr., Chief U.S.D.J.

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If Your Honor has any questions or requires any additional information regarding this matter, please have a member of Your Honor's staff contact me. We thank Your Honor for your kind consideration.

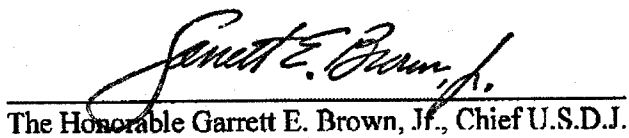
Respectfully submitted,



Brian J. McMahon  
Director

cc: James S. Notis, Esq. (via facsimile)  
Arian J. Tadler, Esq. (via facsimile)  
Todd L. Kammerman, Esq. (via facsimile)  
Laurence Rosen, Esq. (via facsimile)

SO ORDERED:



The Honorable Garrett E. Brown, Jr., Chief U.S.D.J.

Dated: April <sup>24<sup>th</sup></sup>, 2009